

# Third Party Sanitary Survey Program



Fact Sheet  
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Environmental Health Programs  
Division of Drinking Water

## Background

Sanitary Surveys, or periodic inspections of water system facilities, operations and record keeping are recognized as an important element of the public water system oversight process. The Department of Health (DOH) would like to increase involvement of other professionals such as local health jurisdictions (LHJ) and independent contractors where they may be able to provide more cost-effective services.

## Public Health Issues

Contamination, poor water quality, and unreliable service can result from faulty operational practices and sanitary defects in water system facilities. These conditions, which may represent a health risk to those drinking the system's water, can frequently be identified by routine inspection of water system facilities. Well-directed sanitary surveys can help a water system identify and resolve problems before significantly risking the public's health.

## Key Points

Since 1995, the DOH Division of Drinking Water has prioritized staff efforts to systems having the greatest public health impact (the larger systems and surface water sources or sources identified as groundwater under the influence of surface water). Therefore, the focus of the third party sanitary survey program is on Community systems with less than 100 connections and Noncommunity systems that use groundwater sources or purchase water from another Group A public water system.

The Group A regulations (WAC 246-290-416) call for routine sanitary surveys of all Group A systems by the department or the department's qualified designee. All Group A systems must be surveyed once every five years or more frequently as determined by the department. DOH does not have sufficient staff to inspect, where a survey requirement remains in place.

The lack of a satisfactory survey, and a violation of one or more of the water quality regulations, may result in increased monitoring. An unsatisfactory survey may also trigger an increased monitoring requirement at least until the deficiencies are satisfactorily addressed. WAC 246-290-300 outlines conditions under which the department may increase monitoring requirements. These include when the department determines the degree of source protection is not satisfactory, or when contamination is present or suspected.

## What We're Doing

The Third Party Surveyor Program has been developed to allow non-DOH Division of Drinking Water professionals to conduct surveys and provide assistance. In most counties, the LHJ administers the program under an agreement with DOH. Where the LHJ has elected not to participate in this program, a QSS could be contracted to conduct the surveys.

### *Roles & Responsibilities*

Role and responsibilities of the qualified sanitary surveyor include:

- Meeting Washington State registration or minimum employment qualifications (P.E., Engineer in Training, WDM2 or greater, WTPO2 or greater, R.S., or LHJ-EHS, or other LHJ designee)
- Complete qualified sanitary surveyor application form
- Attend DOH Administrative Training session

- Maintain DOH QSS qualification and attend DOH training session at least once every three years
- Follow DOH process (explained in DOH training and materials)
- Provide DOH and utility with a copy of a standard DOH survey report checklist. A more detailed letter, report or checklist may be submitted to the utility also.

*DOH Approved QSS List* Under the QSS program, a list with qualified professionals capable of conducting surveys of systems and providing assistance will be developed and maintained by DOH. To qualify, these individuals need to have completed a 1-day administration training program and a 2-day technical training workshop on how to conduct sanitary surveys. The 2-day workshop requirement may be waived due to limited training sessions and minimum class size. Requests for a waiver will be evaluated on the strength of the applicant's application (recent experience, education, and registration/certification).

*DOH/QSS Agreement* An agreement between DOH and each QSS authorizes the individual to act on behalf of DOH. Completion of the training program and the inclusion of the individual's name on the DOH list of available QSSs is evidence of the agreement. Additionally, individuals have agreed to conduct their surveys to include at least the DOH minimum requirements and to report their findings to the state. Individuals actually doing the inspections and acting on behalf of the state are the ones qualified, not their affiliated organizations. Failure to meet the conditions of the agreement will result in cancellation of the agreement and removal of that individual's name from the DOH approved list.

*Role of QSS* The intent of surveys conducted by a QSS is to identify problems or potential problems in providing safe and reliable drinking water. It is not the role of the QSS to correct, or to make recommendations to correct the problems. If repairs or other system improvements are made within a reasonable timeframe (i.e., two weeks) it is permissible for the QSS to delay the submission of the checklist report to DOH until it can reflect the current improved conditions. This may require a second inspection.

*DOH Use of Surveys* DOH will use the results of the surveys to recommend improvements, to possibly reduce coliform monitoring requirements, and to take enforcement actions if necessary.

*QSS Vested Interest* A QSS with a vested interest in a particular water system cannot survey that system. Such vested interest may include being a board member or owner, an employee, contract operator or even a customer of the system.

## Conclusions

The average Washingtonian served by a small water system is often unaware of problems that may be experienced by their system. These problems may threaten the system's ability to provide safe and reliable water, and it is DOH's responsibility to see that they are detected and addressed. Through the QSS program, DOH is increasing the number of sanitary surveys conducted. Increasing the number of surveys conducted will assist in addressing existing problems, preventing new ones from occurring, and protecting the health of the citizens deriving their water from small systems.

## More Information

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